

October 27, 2021

VIA ELECTRONIC FILING

Kris Monteith
Bureau Chief
Wireline Competition Bureau
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42;
Telecommunications Carriers Eligible for Universal Service Support, WC Docket No.
09-197; Connect America Fund, WC Docket No. 10-90

**Ex Parte Letter for a Pause of the Lifeline Minimum Service Standard and
Reinstatement of Voice Subsidy**

Dear Ms. Monteith:

National Consumer Law Center, on behalf of its low-income clients, United Church of Christ Media Justice Ministry and Common Cause urge the Federal Communications Commission to immediately pause the scheduled increase in the Lifeline minimum service standards for Lifeline mobile data and the scheduled phase out of Lifeline voice support.¹ We and many other groups, on multiple occasions, urged the Commission to pause the scheduled increase in the minimum service standards pending an analysis of impact on the Lifeline Marketplace² and urged the Commission to not phase out Lifeline voice support.³

¹ See *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 et al., Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962, 3989-3997, paras. 73-98 (2016) (*2016 Lifeline Order* or *2016 Order*); 47 CFR § 54.408.

² See e.g., Joint Public Interest Comments in support of NALA Petition of Waiver of Lifeline Mobile Broadband Minimum Service Standard and Voice Support Phase-Down, WC Docket Nos. 11-42, 09-197, 10-90 (September 14, 2020); Public Interest Letter Requesting the Extension of COVID-19 Waivers, Restoration of Lifeline Voice Support and Freeze of Lifeline Minimum Service Standards, WC Docket Nos. 11-42, 09-197, 96-45, 17-287 (August 10, 2020); Public Interest Letter in Support of the Joint Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study, WC Docket 11-42 (July 31, 2019); Joint Petition to Pause

The COVID-19 virus remains a public health threat throughout the United States and the Delta variant is far more infectious and easily transmissible than the original strain of COVID-19. Low-income assistance program intake sites in many areas remain closed or have restricted ability to serve walk-in customers, thus voice Lifeline minutes are more critical than ever, particularly where call wait times are long. A recent analysis of the first round of Emergency Rental Assistance Programs (ERAP) noted one common barriers to tenant access to this important eviction and utility assistance was that “cellphone minutes often run out for low-income households before the end of the month, making contact [with the tenant applicants] more difficult.”⁴ Access to voice service is also critical for low-income access to telehealth services.⁵

We urge the Commission take immediate action to restore Lifeline voice support to \$9.25/month as households trying to access essential services and assistance during this COVID-19 pandemic must rely more on voice service to access benefits and telehealth services. Far from

Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study, DA 19-617, WC Docket No. 11-42 (June 27, 2019).

³ See e.g., UCC and NCLC Comments in Support of Reconsideration, WC Docket Nos. 11-42, 09-197, 10-90 (August 2, 2021); Joint Public Interest Comments in support of NALA Petition of Waiver of Lifeline Mobile Broadband Minimum Service Standard and Voice Support Phase-Down, WC Docket Nos. 11-42, 09-197, 10-90 (September 14, 2020); Public Interest Letter Requesting the Extension of COVID-19 Waivers, Restoration of Lifeline Voice Support and Freeze of Lifeline Minimum Service Standards, WC Docket Nos. 11-42, 09-197, 96-45, 17-287 (August 10, 2020); Public Interest Letter in Support of the Joint Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study, WC Docket 11-42 (July 31, 2019); Joint Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study, DA 19-617, WC Docket No. 11-42 (June 27, 2019).

⁴ See Claudia Aiken, Vincent Reina, Julia Verbrugge et al, “Learning from Emergency Rental Assistance Programs: Lessons from Fifteen Case Studies,” Housing Initiative at Penn, National Low Income Housing Coalition, NYU Furman Center, Housing Crisis Research Collaborative at 9. Available at <https://nlihc.org/sites/default/files/ERA-Programs-Case-Study.pdf>.

⁵ Boston Globe, Editorial Board, “A New Chance to Close the Digital Divide: The coronavirus outbreak shows the depth of phone and broadband problems faced by the most vulnerable people. It’s time for fresh ideas to bridge the gap.” (updated April 26, 2020). Available at <https://www.bostonglobe.com/2020/04/26/opinion/new-chance-close-digital-divide/>.

being obsolete, voice service remains critical for access to emergency services and life-saving emergency alerts.

Sincerely,

/s/ Olivia Wein

National Consumer Law Center, on behalf of its low-income clients
1001 Connecticut Avenue, NW, Suite 510
Washington, DC 20036-5528

/s/ Cheryl A. Leanza

United Church of Christ Media Justice Ministry
100 Maryland Ave., NE Suite 330
Washington, DC 20002

/s/ Yosef Getachew

Common Cause
805 15th St. NW
Washington, DC 20005